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UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

PORTLAND DIVISION

LOUJAIN HATHLOUL ALHATHLOUL,

Civil No. 3:21-cv-01787-IM

Plaintiff.

v.

DARKMATTER GROUP, MARC BAIER, RYAN ADAMS, and DANIEL GERICKE PLAINTIFF'S UNOPPOSED MOTION FOR EXTENSION OF TIME TO RESPOND TO DEFENDANTS' MOTION TO DISMISS

Defendants.

LOCAL RULE 7-1 CERTIFICATION

The undersigned counsel certify that counsel for Plaintiff have conferred with counsel for Defendants and Defendants do not oppose this motion.

MOTION

Plaintiff Loujain Alhathloul ("Plaintiff") by and through her undersigned counsel, hereby submits this Unopposed Motion for Extension of Time to Respond to Defendants' Motion to Dismiss. Plaintiff seeks to extend the deadline for filing a response to Defendants' Motion to Dismiss until July 14, 2022.

Defendant DarkMatter Group and each of the Individual Defendants (Marc Baier, Ryan Adams, and Daniel Gericke) served their Motion to Dismiss electronically through CM/ECF on May 31, 2022. (*See* Motion to Dismiss (ECF 28)). According to Local Rule 7-1(e), Plaintiff must file and serve any response within 14 days after service of the motion, which would make Plaintiff's response due on June 14, 2022.

Plaintiff requests an extension until July 14, 2022 to file her response, representing an extension of 30 days from the original deadline. Defendants agreed not to oppose this request.

805 SW Broadway, Suite 1900 Portland, OR 97205 Telephone: (503) 228-0487 Facsimile: (503) 227-5984 WHEREFORE Plaintiff hereby respectfully requests that the Court grant this unopposed motion for an extension of time until July 14, 2022 for Plaintiff to file her response to Defendants' Motion to Dismiss.

Dated: June 9, 2022.

Respectfully submitted,

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Page 3 – PLAINTIFF'S UNOPPOSED MOTION FOR EXTENSION OF TIME

TO RESPOND TO DEFENDANTS' MOTION TO DISMISS

Attorneys for Plaintiff Loujain Hathloul Alhathloul